REMARKS

The Examiner has rejected claims 21-29 over Shih in view of Lo.

Claim 21, from which all of the other claims are dependent, recites:

> entering, at a user interface associated with the input scanner, a destination of a document scanned at the input scanner, the destination including a reference to a ***predetermined file location retained in the destination computer***;
>
> the ***destination computer polling the file location***; and
>
> image data moving from the input scanner ***directly to a port*** associated with the destination computer.

Examiner alleges that the primary reference, Shih, teaches entering the predetermined file location in the destination computer, and points to various passage in Shih to demonstrate the teaching.

However, Shih clearly states that "the document signals are transmitted across the network in an *electronic mail (e-mail) format*" (column 3, lines 51-54, emphasis added).

As is well known in the art, in order to sustain any electronic mail format, there *must* be provided at least one e-mail server, interposed between the source and the destination of the data. In the claimed invention, image data is moved **directly to a port** associated with the destination computer, *without* any intervening computer as would be required to sustain an e-mail format. The phrase "directly to a port" recites in Claim 21 clearly distinguishes the claimed invention from the e-mail model of Shih.

The secondary reference, Lo, is cited for teaching a scanning system wherein the image is sent from the scanner to the destination port. However, Lo clearly teaches a scanner *server* interposed between a scanner and a destination computer, or client computer:

> These and other objects [of the invention] are accomplished by a network image scanning system which includes a client computer

> **and a scanner server computer connected by a network,** the server computer having the scanner connected thereto. ... [A] virtual TWAIN driver allows the application program to act, to a certain extent, **as if the client computer is directly connected to an image scanner, even though the scanner is connected to a scanner server,** the scanner server being connected to the client computer over a computer network. (Column 2, lines 22-33, emphases added)

By its own admission, Lo teaches that it is desirable that a scanner server be invisible so that the scanner "seems" to be directly connected to the client computer— but there is *still* a scanner server between the scanner and the destination computer. With the claimed invention, there is *actually* a direct connection between a scanner and a destination computer, *without* an intermediate server.

The claimed invention recites a direct connection (i.e., with no interposed server) between a scanner and a port of a destination computer. Shih teaches moving data through a network in an e-mail format, which indicates there is an intermediate e-mail server. Lo clearly teaches the existence of an intermediate network server. **Neither reference, alone or in combination, teaches or suggests a direct connection between a scanner and a port of a destination computer.** For this reason, claim 21 and its dependent claims are allowable.

No additional fee is believed to be required for this amendment; however, the undersigned Xerox Corporation attorney authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he is hereby requested to call the undersigned attorney at (585) 423-3811, Rochester, NY.

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